IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

KATHRYN HYLAND, MELISSA GARCIA, ELIZABETH TAYLOR, JESSICA SAINT-PAUL, REBECCA SPITLER-LAWSON, MICHELLE MEANS, ELIZABETH KAPLAN, JENNIFER GUTH, MEGAN NOCERINO, and ANTHONY CHURCH individually and on behalf of all others similarly situated,

No. 18-cv-9031-DLC-BLM

Plaintiffs,

v.

NAVIENT CORPORATION and NAVIENT SOLUTIONS, LLC,

Defendants.

PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT

PLEASE TAKE NOTICE that Plaintiffs Kathryn Hyland, Melissa Garcia, Elizabeth Taylor, Jessica Saint-Paul, Rebecca Spitler-Lawson, Michelle Means, Elizabeth Kaplan, Jennifer Guth, Megan Nocerino, and Anthony Church (collectively, "Plaintiffs"), by and through their undersigned counsel, shall move the Court before the Honorable Denise L. Cote, United States District Court Judge, at the United States District Court for the Southern District of New York, Courtroom 18B, 500 Pearl Street, New York, NY 10007-1312, on October 2, 2020, for an order pursuant to Federal Rules of Civil Procedure 23(b)(2) and 23(e) granting (i) final approval of the proposed class action settlement, and (ii) certification of the settlement class, upon the contemporaneously filed Memorandum of Law and Declaration of Yelena Konanova, and all exhibits thereto (the "Motion"). Defendants Navient Solutions, LLC and Navient Corporation do not oppose Plaintiffs' Motion.

Dated: New York, NY

August 28, 2020

Respectfully submitted,

SELENDY & GAY PLLC

By: /s/ Faith Gay

Faith Gay Maria Ginzburg

Yelena Konanova Margaret Siller

David A. Coon

SELENDY & GAY, PLLC 1290 Avenue of the Americas

New York, NY 10104

Tel: 212-390-9000

E-mail: fgay@selendygay.com mginzburg@selendygay.com lkonanova@selendygay.com msiller@selendygay.com dcoon@selendygay.com

Mark Richard

PHILLIPS, RICHARD & RIND, P.A.

9360 SW 72 Street, Suite 283

Miami, FL 33173

Telephone: 305-412-8322

E-mail: mrichard@phillipsrichard.com

(admitted *pro hac vice*)

Attorneys for Plaintiffs